

Document Log Item

Addressing	
From	To
"Steven Costa" <glatzeldacosta@suddenlink.net>	Liliana Christophe/R9/USEPA/US@EPA
CC	BCC
"Joe Carney" <Joe.Carney@delmonte.com> "Samual Augspurger" <saugspurger@sampac.com> "Jim Cox" <jcox@cosintl.com> "Tim Ruby" <Tim.Ruby@delmonte.com> Carl Goldstein/R9/USEPA/US@EPA	
Description Form Used: Memo	
Subject	Date/Time
DMRs for StarKist and COS Samoa Packing (American Samoa)	06/04/2008 04:39 PM
# of Attachments	Total Bytes
0	8,226
NPM	Contributor
	Marcela VonVacano
Processing	
Comments	

Body

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Liliana,

Carl forwarded the new DMR forms for the American Samoa Canneries (AS0000027 [COS] and AS0000019 [StarKist]) to me for review because I typically assist the canneries with NPDES permit compliance issues. I have a couple of questions and comments on the forms:

[1] BOD is monitoring only for both canneries, however the DMR for StarKist requires reporting loading and the DMR for COS requires the reporting of concentration. Should these not be

the same since it is a common outfall into a single water body? I believe they should both be reporting concentration based on the permits (the units are listed in mg/l in both permits).

[2] The reporting for ammonia is listed differently in the two sets of DMRs. The COS DMR requires reporting of "Ammonia (as N) +unionized ammonia" and the StarKist Permit requires "Nitrogen, ammonia total (as N)". The permits require monitoring "Total ammonia (as N)". I believe these are all the same thing, but since the parameter numbers are different I am not sure. They should be consistent?

[3] On the COS DMRs, be advised that Herman Gebauer is no long there. I am not sure that on the StarKist DMRs Joe Carney is the appropriate recipient. I am copying this email to the canneries and will let them respond as to the appropriate recipient of the DMR forms.

[4] The frequency of analysis specification on the COS DMRs is a bit confusing (I am not sure exactly what is intended). It seems to me that the specifications should be the same as on the StarKist Permit.

I reviewed the listed permit limitations on the DMRs and found them all consistent with the permit except for BOD as noted in Item [1] above.

Please give me a call if any of this is not clear or we need to discuss further.

Steve Costa
Karen Glatzel

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